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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X)	
In re)	Chapter 11
)	
PURDUE PHARMA L.P., <i>et al.</i> ,)	Case No. 19-23649 (RDD)
)	
Debtors.)	(Jointly Administered)
)	
-----X)	

**CERTAIN TRIBES ADOPTION OF AND JOINDER TO THE OBJECTION OF
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
PURDUE PHARMA L.P., *ET AL.* TO DEBTORS' MOTION TO
ASSUME PREPETITION REIMBURSEMENT AGREEMENT WITH THE
AD HOC COMMITTEE, AND TO PAY THE
FEES AND EXPENSES OF THE AD HOC COMMITTEE'S PROFESSIONALS**

Certain Native American Tribes¹, by and through the undersigned attorneys, incorporate
herein and join in the Objection of the Official Unsecured Creditors Committee of Purdue Pharma

¹ Listed on Exhibit A hereto.

L.P., *et al.* to Debtors' Motion to Assume Prepetition Reimbursement Agreement with the Ad Hoc Committee, and to Pay the Fees and Expenses of the Ad Hoc Committee's Professionals, and add the following independent basis for denial of the Debtors' Motion:

The opioid crisis has more gravely impacted Native Americans on a proportionate basis than any other segment of American society. The Certain Native American Tribes, and tribes generally, have a desperate need to abate the opioid scourge that has disproportionately scarred Native American populations and strained their resources to the breaking point. Every nickel must be preserved in the Debtors' estates for small Native American tribes to have any fair chance at some compensation for the existential threat these tribes face from the opioid disaster promulgated by the Debtors. There is no justifiable reason for desperately needed estate funds to be diverted to compensate the so-called unofficial consenting ad hoc committee, which appears to represent only 17 creditors and a committee of MDL lawyers. Further, this ad hoc committee is just one of eight such informal creditor groups, each of which is capable of bearing its own fees and expenses as they pursue their interests in these cases.

For the reasons set forth above, the Debtors' Motion should be denied.

November 13, 2019
Dallas, Texas

**STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA
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By: /s/ Sander L. Esserman

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EXHIBIT A

Native American Tribes

1. Bad River Band of Lake Superior Tribe of Chippewa Indians/Bad River Health & Wellness Center
2. Battle Mountain Band of Te-Moak Tribe of Western Shoshone Indians
3. Big Sandy Rancheria of Mono Indians
4. Big Valley Band of Pomo Indians
5. Cahto Tribe of the Laytonville Rancheria
6. Cher-Ae Heights Indian Community of the Trinidad Rancheria
7. Cheyenne & Arapaho Tribes and Clinic
8. Chicken Ranch Rancheria of Me-Wuk Indians
9. Chitimacha Tribe of Louisiana
10. Coyote Valley Band of Pomo Indians
11. Ely Shoshone Tribe of Nevada
12. Ewiiapaayp Band of Kumeyaay Indians
13. Fallon Paiute-Shoshone Tribe
14. Fond du Lac Band of Superior Chippewa
15. Guidiville Rancheria of California
16. Ho Chunk Nation
17. Hopland Band of Pomo Indians
18. Koi Nation
19. Lac Courte Oreilles Band of Lake Superior
20. Lac du Flambeau Band of Lake Superior Ind.
21. Manchester Band of Pomo Indians
22. Mentasta Traditional Council
23. Pinoleville Pomo Nation
24. Potter Valley Tribe
25. Pueblo of Pojoaque
26. Pyramid Lake Paiute Tribe
27. Red Cliff Band of Lake Superior Chippewas
28. Redwood Valley Tribe
29. Reno-Sparks Indian Colony
30. Resighini Rancheria
31. Robinson Rancheria of Pomo Indians
32. Round Valley Indian Tribes and Round Valley Indian Health Center
33. Scotts Valley Band of Pomo Indians
34. Shinnecock Indian Nation
35. South Fork Band of the Te-Moak Tribe of Western Shoshone Indians
36. St. Croix Chippewa Indians of WI
37. Walker River Paiute Tribe
38. Wampanoag Tribe of Gay Head (Aquinnah)
39. Coquille Indian Tribe
40. Confederated Tribes of the Goshute Reservation

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SOUTHERN DISTRICT OF NEW YORK**

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In re) Chapter 11
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PURDUE PHARMA L.P., et al.,) Case No. 19-23649 (RDD)
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Debtors.) (Jointly Administered)
)
-----X	

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been duly served upon all counsel or parties of record by the Court's ECF system and on the attached Service List in accordance with the Court's Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures on November 13, 2019.

Respectfully submitted,

**STUTZMAN, BROMBERG,
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**COUNSEL TO CERTAIN NATIVE
AMERICAN TRIBES, HEALTH
ORGANIZATIONS, MUNICIPALITIES,
AND UNIONS**

In re: Purdue Pharma L.P., et al.
Master Service List
Case No. 19-23649 (RDO)

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In re: Purdue Pharma L.P., et al.
Master Service List
Case No. 19-23649 (RDO)

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Internal Revenue Service	Internal Revenue Service	Centralized Insolvency Operation	P.O. Box 7346		Philadelphia	PA	19101-7346		800-973-0424	855-235-6787	FIRST CLASS US MAIL
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Case No. 19-23649 (ROD)

DESCRIPTION	NAME	NOTICE NAME	ADDRESS 1	ADDRESS 2	CITY	STATE	ZIP	COUNTRY	PHONE	FAX	EMAIL
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State Attorney General	Office of the State of Connecticut Attorney General	Attn: Denise S. Mondell, Assistant AG Attn: Brett T. Delange - Deputy AG Chief, Consumer Protection Division	55 Elm Street, P.O. Box 120		Hartford	CT	06141-0120		860-808-5150	860-808-5385	Denise.Mondell@ct.gov
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State Attorney General	Office of the State of Iowa Attorney General	Attn: Jill S. Abrams	109 State Street		Des Moines	IA	50312		515-242-6773	515-281-6771	william.pearson@ag.iowa.gov
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Office of The United States Trustee	Office of The United States Trustee	Attn: Paul Schwartzberg	U.S. Federal Office Building		New York	NY	10014		212-510-0500 ext. 221	212-568-2361	FIRST CLASS US MAIL

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DESCRIPTION	NAME	NOTICE NAME	ADDRESS 1	ADDRESS 2	CITY	STATE	ZIP	COUNTRY	PHONE	FAX	EMAIL
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Claims and Noticing Attorney General	Prime Clerk, LLC	Attn: Herb Baer	One Grand Central Place	Suite 1440	New York	NY	10165		212-257-5450	646-328-2851	
Debtors	Purdue Pharma L.P.	Attn: President or General Counsel	One Stamford Forum, 201 Tresser Boulevard		Stamford	CT	06901		502-814-2139		FIRST CLASS US MAIL
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DESCRIPTION	NAME	NOTICE NAME	ADDRESS 1	ADDRESS 2	CITY	STATE	ZIP	COUNTRY	PHONE	FAX	EMAIL
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State Attorney General	State of Mississippi Attorney General	Attn: Bankruptcy Department	Walter Sillers Building	550 High Street, Suite 1200, P.O. Box 220	Jackson	MS	39201		601-359-3680		FIRST CLASS US MAIL
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State Attorney General	State of South Carolina Attorney General	Attn: Bankruptcy Department	P.O. Box 11549		Columbia	SC	29211-1549		803-734-3970		FIRST CLASS US MAIL
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State Attorney General	State of Virginia Attorney General	Attn: Bankruptcy Department	900 East Main Street		Richmond	VA	23219		804-786-2071	804-225-4378	FIRST CLASS US MAIL
State Attorney General	State of Washington Attorney General	Attn: Bankruptcy Department	1125 Washington St. SE	P.O. Box 40100	Olympia	WA	98504-0100		360-753-6200		FIRST CLASS US MAIL
State Attorney General	State of West Virginia Attorney General	Attn: Abby Cunningham, Assistant AG for West Virginia	State Capitol Bldg 1 Room E 26		Charleston	WV	25305		304-558-2021	304-558-0140	Abby.Cunningham@wvago.gov
State Attorney General	State of Wisconsin Attorney General	Attn: Bankruptcy Department	Wisconsin Department of Justice	114 East, P.O. Box 7857	Madison	WI	53707-7857		608-266-1221	608-267-2779	FIRST CLASS US MAIL
State Attorney General	State of Wyoming Attorney General	Attn: Bankruptcy Department	123 Capitol Building	200 W. 24th Street	Cheyenne	WY	82002		307-777-7841	307-777-6869	FIRST CLASS US MAIL

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DESCRIPTION	NAME	NOTICE NAME	ADDRESS 1	ADDRESS 2	CITY	STATE	ZIP	COUNTRY	PHONE	FAX	EMAIL
Counsel to Ronald D. Stracener, F. Kirk Hopkins, Jordan Chu, Anel Eiland, Nadja Strelter, Michael Konig, Eli Medina, Barbara Rivers, Marketing Services of Indiana, Inc., Glenn Golden, Gretta Golden, Michael Christy, Edward Grace, Debra Dawsey, Darcy Sherman, Kimberly Brand, Lou Sardella, Michael Kodzinski, Kevin Wilk, Heather Enders, Jason Reynolds, MSI Corporation, Deborah Green-Kuchta, W. Andrew Fox, Dora Lawrence, Michael Lopez, Zachary R. Schneider, and the Putative Classes	Stevens & Lee, P.C. Stutzman, Bronberg, Esserman & Plikka, a Professional Corporation	Attn: Nicholas F. Kajan and Constantine D. Pourals	485 Madison Avenue, 20th Floor		New York	NY	10022		212-319-8500	212-319-8505	nfk@stevenslee.com cp@stevenslee.com
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